



June 8, 2022

Via ECF

Hon. Analisa Torres
United States District Court Judge
United States District Court-SDNY
500 Pearl Street
New York, NY 10007

Re: Sydney Hyman v. Andrew Fabbri and Jessica Cohen
Case No. 19-civ. 10506 (AT)(SLC)
Response to Order to Show Cause

Dear Judge Torres:

We represent the Defendant, Andrew Fabbri (“Fabbri”) (“the Defendant”), in the above-referenced matter. Please accept this letter in response to this Court’s Order to Show Cause dated June 3, 2022, requesting a letter from the undersigned detailing the basis for the Court’s jurisdiction over this action, with specific reference to the Defendant’s state of domicile at the time the initial complaint was filed.

While the Defendant would not object– and in fact believes it would benefit both Parties – to remand this matter to State Court, this Court has diversity jurisdiction because the Defendant’s domicile in 2019 – when this action was commenced – was New Jersey.

The Defendant partially owns a company located in Manhattan, and has had his office there since the company was founded in October 2015.

In September 2016, immediately after the fire that is the focus of this case, the Defendant and former co-Defendant Jessica Cohen moved to Stony Point, New York, to reside with Cohen’s parents.



Between November 15, 2016, and November 15, 2017, the Defendant resided at 505 Greenwich Street, New York, New York, with Cohen.

Between November 16, 2017 and August 31, 2018, the Defendant resided in Stony Point with Cohen.

On September 1, 2018, the Defendant and Cohen moved to 53 Oxford Landing, Weehawken, New Jersey. The Defendant's lease is set to expire shortly and he and Cohen are looking to move back to New York.

Very Truly Yours,

/s/ Murad Michael Khan
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cc: Counsel for Record (w/enc.), via ECF